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FEDERAL ELECTION COMMISSION
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Washington, D.C. 20463

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FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

MUR: 5586

DATE COMPLAINT FILED: October 27, 2004

DATE OF NOTIFICATION: November 3, 2004

LAST RESPONSE RECEIVED: December 27, 2004

DATE ACTIVATED: July 11, 2005

EXPIRATION OF SOL: September 3, 2009

COMPLAINANT:

Stephen Shiver, Executive Director of
Political Affairs, Republican Party of Florida

RESPONDENTS:

Florida Democratic Party
Kerry-Edwards 2004, Inc. and David Thorne,¹ in his
official capacity as treasurer
DNC Services Corporation/Democratic National
Committee and Andrew Tobias, in his official
capacity as treasurer
Florida Democratic Victory 2004
Florida AFL-CIO
Florida Education Association
Academy of Florida Trial Lawyers
Florida SEIU
Representative Kendrick Meek

**RELEVANT STATUTES AND
REGULATIONS:**

2 U.S.C. § 441a(a)(7)(B)(i)
2 U.S.C. § 441b(a)
2 U.S.C. § 441i
11 C.F.R. § 109.20
11 C.F.R. § 109.21

INTERNAL REPORTS CHECKED: Disclosure reports; Commission indices

FEDERAL AGENCIES CHECKED: None

¹ At the time of the activity in this matter, Robert Farmer was treasurer of Kerry-Edwards 2004, Inc.

I. INTRODUCTION

The complaint alleges that a planning manual of the "Victory 2004 Florida Coordinated Campaign" (the "manual") is evidence of coordination between respondent political committees and non-committee entities for public communications; the raising, spending and directing of nonfederal funds by candidates for federal office, federal officeholders, the Florida Democratic Party ("FDP") and the DNC; and excessive and prohibited contributions to candidates and party committees.

Based on the complaint, responses, and the public information we have reviewed, it does not appear that there is a sufficient basis to merit an investigation in this matter. Accordingly, we recommend that the Commission find no reason to believe that respondents violated the Act or Commission regulations as alleged in the complaint. Furthermore, because respondent Florida Democratic Victory 2004 ("FDV") appears not to be a separate legal entity but merely a project name used by the FDP, this Office recommends that the Commission dismiss the complaint as to FDV.

II. FACTUAL AND LEGAL ANALYSIS

A. Summary of Complaint and Responses

1. Complaint

The complaint asserts that the manual, dated September 3, 2004 and attached to the complaint, "established an entire campaign strategy for the State of Florida through the combined efforts of the respondents."² According to complainant, the "decision making table"

² The manual is a voter contact and GOTV plan that states its intention to "rightfully return the state to the blue side of the electoral ledger." The plan would involve thousands of volunteers that would be "complemented by a generous paid and earned media campaign and an advanced technology system to track and direct progress." The plan would focus primarily on two segments of the Florida electorate: the underperforming Democratic base and swing voters. A "Coordinated Campaign Decision Making Table" is described as a "committee of the following individuals and organizations [that] will serve as table partners of the Coordinated Campaign. The committee will meet bi-weekly through September and weekly during October." The following persons are listed: State Party

1 laid out on the first page of the manual demonstrates that the Democratic Party, Democratic
2 candidates and non-committee entities coordinated their efforts, plans, strategies and spending,
3 citing the manual's "Vote Goals & Targeting," plans for paid and volunteer phone calls and paid
4 mail, paid early voter motivation efforts and absentee voting programs. The complaint also
5 describes some activity as being funded with 100% nonfederal funds, "the exact type of spending
6 that federal candidates and officeholders and national political party officials are now prohibited
7 from being involved in." Complaint at 2. The signature page of the manual states "I hereby
8 agree to participate in the coordinated campaign, Florida Victory 2004, and to contribute field
9 and fundraising help at the levels ascribed below." The copy of the manual is unsigned and no
10 information is included regarding any "field and fundraising help" pledged.

11 As further evidence of coordination and nonfederal spending, complainant notes that the
12 manual includes a memorandum by Stephen F. Rosenthal titled "Early Voting in Florida" and
13 marked "Attorney-Client Privileged, Attorney Work Product." Complainant alleges that
14 Rosenthal is the CEO of America Coming Together ("ACT") and that it is "highly suspicious"
15 that the memo is included in a document signed by the DNC. Complainant asserts that to the
16 extent Kerry-Edwards 2004 ("K-E 2004"), the DNC, or other federal candidates or officeholders,

Chair Scott Maddox; Kerry-Edwards Campaign; U.S. Senate Nominee; Coordinated Campaign Director; AFL-CIO; SEIU; Florida Academy of Trial Lawyers; Florida Education Association; and Florida Congressional Delegation. The manual lists the following goals: Identify undecided and persuadable voters for John Kerry and the Democratic ticket; Energize and motivate Democrats with unreliable or non-voting histories; Track statewide volunteer efforts in Florida-specific software; Recruit and train 1,391 precinct captains in base precincts; Recruit and train 2,418 precinct captains in swing precincts; Turn out Kerry supporters in base precincts; Persuade swing targets in swing precincts; and Win the state of Florida for Kerry-Edwards with 3,314,240 supporters. (All this information appears on page one of the manual). The manual does not specify tasks to be conducted by the various entities. In addition, the manual contains a chart of GOTV tasks with costs totaling \$3,875,748.12, but does not specify levels of funding to be provided by the various entities. See manual page 9.

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or their agents, are involved in communications about plans or strategies with ACT, whose spending is 98% nonfederal, they are involved in nonfederal raising and spending of money prohibited under BCRA.

The complaint proceeds to observe that the FDP's disclosed federal share of its overall expenses (36%) is smaller than that of the Florida Republican Party (50%). Complainant takes this data from the committees' September monthly reports' year-to-date ("YTD") figures and compares it to the federal percentage of spending by the Democratic and Republican Parties of Ohio (22% and 18%, respectively).⁴ Complainant concludes that the comparative lack of federal spending on the part of the FDP "is further evidence of prohibited soft money spending on behalf of the state party by agreement of the [respondent] parties."

On the basis of the foregoing, complainant alleges coordinated expenditures resulting in excessive or prohibited contributions from the non-committee entities that the committee entities (FDP and K-E 2004) failed to report; that the non-committee entities became political committees but failed to register with and report to the Commission; and that agents of Senator John Kerry, the presidential nominee, and an incumbent member of the House of Representatives, violated 2 U.S.C. § 441i by directing and controlling the spending of soft money.

2. Responses

The FDP and DNC each respond that the complaint fails to allege specific actions on the part of respondents that would constitute a violation of the Act. FDP resp. at 1; DNC resp. at 1.

⁴ The complaint describes Ohio as "another state whose battleground status is well known." Complaint at 3.

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1 These respondents cite to *McConnell v. Federal Election Commission* for the proposition that
2 national party officials are not prohibited from sitting down with state party committees to plan
3 and advise how to raise and spend nonfederal funds. 124 S. Ct. 619, 670 (2003); FDP resp. at 3;
4 DNC resp. at 3. The FDP and DNC add that the manual is a plan of activities to be undertaken
5 and paid for by the FDP itself, and that the complaint does not refer to any communications, or
6 activity of any kind, that was paid for by any other entity other than the FDP itself.⁵ FDP resp.
7 at 1; DNC resp. at 1. According to respondents, even if the other entities participated in the
8 "decision-making table," these entities would be discussing expenditures to be made by the FDP,
9 not by themselves. FDP resp. at 2; DNC resp. at 2. The FDP and DNC also state that
10 communications paid for by the FDP itself cannot be "coordinated" with other persons. *See*
11 11 C.F.R. § 109.20(a)(1). Further, the FDP and DNC both responded that there were never any
12 pages of the manual detailing any "field help" to be provided by any of the entities listed on the
13 signature page. FDP resp. at 3; DNC resp. at 3.

14 Some of these points are echoed by the K-E 2004/Representative Meeks response,
15 which adds that K-E 2004 is unaware of any individual signing the Plan on behalf of K-E
16 2004, and there are no facts in the document which, if proven true, would constitute a
17 violation by K-E 2004. K-E 2004/Meeks resp. at 2. The response also asserts that there
18 is no allegation specific to Representative Meeks, who is named as a respondent in his
19 capacity as Florida chair of K-E 2004. *Id.* at 1.

⁵ The DNC's response states that it "substantially" provided such funding. *See* DNC resp. at 2. The DNC disclosed nearly \$6.4 million in transfers to the FDP's federal account during 2004. *See* 2 U.S.C. § 441a(a)(4).

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1 The non-committee respondent entities, Florida AFL-CIO ("AFL-CIO"), Florida SEIU
2 ("SEIU"),⁶ Academy of Florida Trial Lawyers ("AFTL") and Florida Education Association
3 ("FEA") respond that they did not carry out activities listed in the manual. AFTL/FEA joint
4 resp. at 1 and accompanying affidavits; AFL-CIO resp. at 2; SEIU resp. at 2. AFTL and FEA
5 state they never saw the manual until it was provided to them with the complaint in this matter.
6 AFTL/FEA resp. at 1 and affidavits. SEIU and AFL-CIO acknowledge that their respective
7 officials were provided with the manual. SEIU resp. at 1; AFL-CIO resp. at 1. SEIU states that
8 its official, Monica Russo, received an electronic copy of the document and did not sign it or
9 otherwise respond to it and did not distribute it to others. SEIU resp. at 2. AFL-CIO president
10 Cynthia Hall participated in a conference call with the FDP in August 2004 in which the FDP
11 stated that it would soon circulate a "coordinated campaign plan for the FDP and requested that
12 each organization review and sign it, as well as make financial contributions to the FDP." Hall
13 declaration ¶3. Hall received the document, "skimmed" it, signed it, and then locked it away,
14 undisturbed, and did not discuss it with anyone. *Id.* at ¶¶4-5. At no time, according to Ms. Hall,
15 did the FDP actually request or suggest that the AFL-CIO engage in any non-restricted class
16 communications, nor did they even discuss any. *Id.* at ¶6. Finally, the AFL-CIO did make
17 donations to the FDP's nonfederal account, prior to the conference call. *Id.* at ¶7.⁷

⁶ The notification letter to "Florida SEIU" was sent to SEIU's international headquarters in Washington, D.C. Service Employees International Union, AFL-CIO responded through counsel that "Florida SEIU" does not exist. The response notes that the signature page of the manual lists "Monica Russo, Florida SEIU"; she is an officer of SEIU Local 1199Florida, an affiliated local union of SEIU, which is not named in the complaint and was not served with the complaint. SEIU resp. at 1-2. Nevertheless, SEIU filed a substantive response to the complaint including what Monica Russo "would testify" to regarding the manual "if called upon to respond." This Office has confirmed that such statements are based upon Counsel's communication with Ms. Russo.

⁷ The FDP's state disclosure reports identify five donations received from the AFL-CIO during 2004, totaling \$18,500, although Cynthia Hall's declaration states \$16,000. Hall declaration ¶7. The latest-dated of the AFL-CIO's donations was August 30, 2004, for \$3,500. In addition, the FDP's federal account disclosed a \$700 disbursement to the AFL-CIO on October 12, 2004 for "refund." This payment does not appear to correspond to any receipt disclosed by the FDP. Because the payment is from the FDP to one of

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1 More broadly, AFTL, FEA and AFL-CIO assert that they made no public
2 communications during 2004.⁸ AFL-CIO and FEA state that all of their communications
3 activities concerning federal elections during 2004 were directed at their restricted classes; AFTL
4 says it did not engage in any activities involving federal candidates during the 2004 election
5 cycle. AFTL/FEA resp. at 1 and affidavit; AFL-CIO resp. at 1 and Hall affidavit at ¶2. The
6 FEA disclosed express advocacy communications to its membership in support of John Kerry for
7 President costing \$20,590 over the period August 27 through October 29, 2004. *See* 2 U.S.C.
8 § 431(9)(B)(iii); 11 C.F.R. § 104.6. The AFL-CIO did not disclose any such communications.
9 Finally, SEIU responded that the information contained in the manual concerning the plans for
10 the coordinated campaign played no role in the political campaign activities undertaken by SEIU
11 during 2004. SEIU resp. at 2.

12 Several responses stated that the complaint has mistaken Stephen F. Rosenthal, the author
13 of the "Early Voting in Florida" memo, with Steve Rosenthal, CEO of ACT. FDP resp. at 3;
14 DNC resp. at 3; K-E 2004/Meeks resp. at 3. Several responses also took issue with the FDP's
15 federal spending percentages cited in the complaint as evidence that the non-committee entities'
16 activity are distorted because they cover only through August 2004, before most spending for the
17 general election even occurred. FDP resp. at 3; DNC resp. at 3. A comparison of the
18 Democratic and Republican Florida state parties' spending through their 2004 Post-General
19 Reports reveals closer figures of 82.7% federal and 89.8% federal, respectively. *See, e.g.*, DNC
20 resp. at 4.

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the non-committee entities in this matter and not the reverse, it does not appear to support the allegations in
the complaint.

⁸ The Act defines "public communication" as "a communication by means of any broadcast, cable, or satellite communication, newspaper, magazine, outdoor advertising facility, mass mailing, or telephone bank to the general public, or any other form of general public political advertising." 2 U.S.C. § 431(22).

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B. Analysis

1. ACT Nonfederal Spending

An as initial matter, some of the bases of the complaint can be straightforwardly dismissed. For example, public information confirms that Stephen F. Rosenthal, the author of the "Early Voting in Florida" memo included in the manual, is an attorney in Florida and is not Steve Rosenthal, the CEO of ACT. Thus, ACT's nonfederal spending is not at issue in this matter.

2. FDP Federal Share of Expenses

Second, the complaint's focus on the FDP's comparatively small federal share of its overall expenses is not convincing. As noted in the responses, the spending figures cited in the complaint do not include most of the FDP's spending for the general election. In fact, the spending figures even precede the September 3, 2004 date of the manual provided in the complaint, and so presumably would not reflect the impact of the activity assertedly arising from the manual. Indeed, the FDP disclosed only \$503,600 YTD spending through August 2004, versus over \$13.6M YTD disclosed on its Post General Report. On that later Report, the FDP disclosed a federal spending percentage not dissimilar to that of the Republican Party of Florida, as noted above in the responses in section II.A.2. Further, even the FDP's assertedly low federal spending percentage (36%) is far above the federal percentage of spending by both the Democratic and Republican Parties of Ohio (22% and 18%, respectively) which the complaint cites as evidence of prohibited soft money spending on behalf of the FDP. For these reasons, the federal spending percentage allegation is too speculative to serve as the basis for an investigation.

3 Coordinated Communications

The manual itself, by contrast, even if it is a plan of FDP activities as claimed by respondents, does initially suggest the possibility of coordinated activity. The manual's description of respondent entities' participation in regular meetings at a "coordinated campaign decision-making table," suggests the possibility of the entities carrying out activity armed with information gained from the discussions, even if such activity is not stated in the manual, which could possibly constitute coordinated communications.

The Commission's regulations provide a three-prong test to determine whether a communication is coordinated with a candidate, an authorized committee or a political party committee. *See* 11 C.F.R. § 109.21. To satisfy the first prong of the test, someone other than that candidate, authorized committee or political party committee must pay for the communication. *See* 11 C.F.R. § 109.21(a)(1). The second prong evaluates the content of the communication. *See* 11 C.F.R. § 109.21(c). The third and final prong of the test evaluates the conduct of the parties. *See* 11 C.F.R. § 109.21(d).

All three prongs of the test must be satisfied to support a conclusion that a coordinated communication occurred. *See* 11 C.F.R. § 109.21(a); *see also* Explanation and Justification for Regulations on Coordinated and Independent Expenditures, 68 Fed. Reg. 772 (Jan. 3, 2003). Coordinated communications constitute in-kind contributions, *see* 11 C.F.R. § 109.21(b), and so SEIU, FEA and AFL-CIO as labor organizations and AFLTL as a corporation are prohibited from making such communications. *See* 2 U.S.C. § 441b(a).

The regular meetings set forth in the manual raise a question whether they might satisfy one or more of the conduct standards. *See, e.g.,* 11 C.F.R. § 109.21(d)(1) (request or suggestion), (d)(2) (material involvement) and (d)(3) (substantial discussion). However, even if

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1 the conduct standard were met, the complaint identifies no communications at all, much less
2 communications that might satisfy the content standard at 11 C.F.R. § 109.21(c). Neither does
3 the complaint provide information as to the remaining prong of the coordinated communication
4 analysis, payment for communications. *See* 11 C.F.R. § 109.21(a)(1). FEA, AFL-CIO and
5 AFTL deny making any public communications, and no information regarding public
6 communications by any of the four non-committee entities has been located by this Office in a
7 search of public information.⁹ Thus, the allegation of coordinated communications is too
8 speculative to serve as the basis for an investigation

9 4. Raising, Spending and Directing of Nonfederal Funds

10 Finally, we address the allegation of the raising, spending and directing of nonfederal
11 funds by the DNC; state party officials, candidates for federal office and federal officeholders.
12 The Act prohibits national party committees from soliciting, receiving or directing funds or other
13 thing of value, or spending any funds, that are not subject to the Act's prohibitions and
14 limitations. 2 U.S.C. § 441i(a). State parties are subject to the requirement that funds they
15 expend or disburse for federal election activity shall be subject to the limitations, prohibitions,

⁹ SEIU's response does not specify whether it undertook public communications. Instead, as noted, it states that the information contained in the manual concerning the plans for the coordinated campaign played no role in the political campaign activities undertaken by SEIU during 2004. SEIU resp. at 2. Although SEIU's response is narrower than the responses of the other non-committee respondents, the complaint identifies no communications by SEIU (or any other person) to support the allegation of coordinated communications.

According to a press article, a national SEIU effort in the 2004 presidential election included "350 SEIU members on union-paid leave from their jobs to mobilize anti-Bush voters across Florida." *Kerry finds friend in union*, St. Petersburg Times, September 19, 2004, available at http://www.sptimes.com/2004/09/19/Decision2004/Kerry_finds_friend_in.shtml. It is unclear, however, whether this activity relates to the manual and the "coordinated campaign decision-making table." Possibly related are payments by the FDP to SEIU at its International headquarters in Washington, D.C.: \$7,805.20 on September 16, 2004 for "staff payroll" and \$7,805.20 on October 11, 2004 for "staff contract services." Such payments would appear to cut against any possible contribution from SEIU to the FDP.

1 and reporting requirements of the Act. 2 U.S.C. § 441i(b).¹⁰ Finally, federal candidates and
2 officeholders shall not solicit, receive, direct, transfer or spend funds in connection with an
3 election for federal office, unless the funds are subject to the limitations, prohibitions and
4 reporting requirements of the Act. 2 U.S.C. § 441i(e).

5 The complaint and other available information do not provide any evidence of the
6 solicitation,¹¹ receipt or direction of nonfederal funds on the part of the DNC or federal
7 candidates or officeholders. See 2 U.S.C. §§ 441i(a) and (e). As noted, the Supreme Court in
8 *McConnell* stated that national party officials are not prohibited from sitting down with state
9 party committees to plan and advise how to raise and spend nonfederal funds. 124 S. Ct. at 670.
10 As long as the national party officer does not personally spend, receive, direct or solicit
11 nonfederal funds, section 441i(a) permits a wide range of joint planning and electioneering
12 activity. *Id.* As for federal candidates or officeholders, there is no evidence that respondent
13 Representative Meeks solicited, received, directed, transferred or spent any funds, much less

¹⁰ This requirement is subject to the exceptions in section 441i(b)(2). The Act defines "federal election activity" to include voter registration activity within 120 days before an election; voter identification, GOTV or generic campaign activity conducted in connection with an election in which a federal candidate appears on the ballot; a public communication that refers to a clearly identified candidate for federal office that promotes, supports, attacks or opposes a candidate for that office; and services provided during any month by an employee of a state, district or local committee of a political party who spends more than 25% of their time on activities in connection with a federal election. 2 U.S.C. § 431(20)(A)

¹¹ The Commission's regulations define "to solicit" as "to ask that another person make a contribution, donation, transfer of funds, or otherwise provide anything of value, whether the contribution, donation, transfer of funds, or thing of value, is to be made or provided directly, or through a conduit or intermediary." 11 C.F.R. § 300.2(m). In *Shays v. FEC*, the D.C. Circuit Court of Appeals upheld a District Court decision that the Commission's definition of "solicit" was invalid because it violated Congress's intent. 337 F. Supp.2d 28 (D.D.C. 2004), *aff'd*, 414 F.3d 76 (D.C. Cir. 2005). The Commission then issued a Notice of Proposed Rulemaking regarding its definition of "to solicit." 70 Fed. Reg. 56,599 (September 28, 2005). The proposed revision would define "to solicit" as "to ask, suggest, or recommend that another person make a contribution, donation, transfer of funds, or otherwise provide anything of value, whether it is to be made or provided directly, or through a conduit or intermediary. A solicitation is a written or oral communication, whether explicit or implicit, construed as a reasonable person would understand it in context." *Id.* at 56,600. The Commission stated that with the new language it seeks to clarify that "to solicit" covers not only communications that explicitly and directly request contributions or donations, but also communications that implicitly or indirectly attempt to motivate another person to make a contribution or donation. *Id.*

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1 funds not subject to the limitations, prohibitions and reporting requirements of the Act. *See*
2 2 U.S.C. § 441i(e). Neither is there evidence provided of similar activity on the part of the
3 signatory to the manual for K-E 2004, Tom Shea, who served as state director for that
4 committee. *See id.*

5 If any person solicited nonfederal funds, the available information indicates that it was
6 the FDP. As noted, AFL-CIO president Cynthia Hall stated in her declaration that FDP
7 representatives in a conference call stated that the FDP would soon circulate a "coordinated
8 campaign plan for the FDP and requested that each organization review and sign it, as well as
9 make financial contributions to the FDP." Hall declaration ¶3. The manual itself, which
10 according to the FDP and DNC responses is an FDP plan, solicits nonfederal funds by asking
11 signatories to contribute fundraising help. State parties, however, are not prohibited from
12 soliciting nonfederal funds. *See* 2 U.S.C. § 441i(b). Further, the FDP's state disclosure reports
13 do not indicate any donations to the FDP from the non-committee entities apart from the AFL-
14 CIO, whose final donation during 2004 preceded the date of the manual and, according to
15 president Hall, preceded the FDP's solicitation. *See* Hall declaration ¶7. Thus, it does not
16 appear that the FDP expended or disbursed for federal election activity funds not subject to the
17 limitations, prohibitions, and reporting requirements of the Act. *See* 2 U.S.C. § 441i(b). Overall,
18 the available information does not indicate that respondents violated 2 U.S.C. §§ 441i(a), (b)
19 or (e).

20 **C. Conclusion**

21 As described, based on the complaint, responses, and the public information we have
22 reviewed, it does not appear that there is a sufficient basis to merit an investigation as to whether

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the various respondent entities coordinated with, and made impermissible or excessive contributions to, the FDP and/or K-E 2004, or that such activity was not disclosed.¹² See 2 U.S.C. §§ 441b(a), 441a(f) and 434. Nor does there appear to be sufficient evidence regarding the allegation that the DNC or federal candidates and officeholders raised, spent or directed nonfederal funds, or that the FDP spent nonfederal funds on federal election activity. See 2 U.S.C. §§ 441i(a), (b) and (e). Although the manual raises questions regarding possible coordinated activity, there is insufficient evidence on which to base a recommendation of reason to believe that violations may have occurred. See Statement of Reasons in MUR 4960 (Hillary Rodham Clinton for U.S. Senate Exploratory Committee, issued December 21, 2000), in which four Commissioners stated, "Absent personal knowledge, the Complainant, at a minimum, should have made a sufficiently specific allegation . . . so as to warrant a focused investigation that can prove or disprove the charge." Accordingly, this Office recommends that the Commission find no reason to believe regarding respondents and close the file in this matter.

III. RECOMMENDATIONS

1. Find no reason to believe that the Florida Democratic Party; Kerry-Edwards 2004, Inc. and David Thorne, in his official capacity as treasurer; DNC Services Corporation/Democratic National Committee and Andrew Tobias, in his official capacity as treasurer; Florida AFL-CIO; Florida Education Association; Academy of Florida Trial Lawyers; Florida SEIU or Representative Kendrick Meek violated the Act or Commission regulations as alleged in the complaint filed in this matter.
2. Dismiss the complaint as to Florida Democratic Victory 2004.
3. Approve the appropriate letters.

¹² Although the complaint alleges a violation of 2 U.S.C. § 441a(a)(7) arising from coordinated activity, the provisions ordinarily cited in connection with impermissible coordinated activity are the contribution limitations and prohibitions, such as 2 U.S.C. §§ 441a(a)(1) and 441b(a). In addition, regarding the allegation that the non-committee entities made contributions, and therefore could have triggered political committee status, in light of the lack of evidence that these entities did so, they do not appear to have failed to register as political committees, as alleged in the complaint. See 2 U.S.C. § 433.

4. Close the file

Lawrence H. Norton
General Counsel

Date:

1/3/06

BY:

Rhonda J. Vosdigh
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